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5 AT SEATTLE
5 CLERK U.S. DISTRICT COURT
5 WESTERN DISTRICT OF WASHINGTON
5 BY DEPUTY
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 HERBCO INTERNATIONAL INC.,
13 EDWARD WILLIAMSON ANDREWS, III,
14 DAVID WILLIAM LYKINS, JR., and
15 DEBRA RAE HOWARD,

16 Defendants.

9 NO. CR12- 100 RSM
10

11 INFORMATION

12 U.S.C. Title 8, Sections
13 1324(a)(1)(A)(iii) & (iv)
14 Harboring Alien; Encourage,
15 Induce Alien to Reside

16 U.S.C. Title 8 Sections 1324(a)(2)
17 and (f); U.S.C. Title 18
18 Section 2 (Aid and Abet
19 Continued Employment of Illegal
20 Alien)

21 (Felony and Misdemeanor)

22 THE UNITED STATES ATTORNEY CHARGES THAT:

23 COUNT I

24 On or about April 22, 2011, at Duvall, within the Western District of Washington,
25 HERBCO INTERNATIONAL INC., a Washington corporation, by and through acts of
26 its employees, acting in the scope of their employment and, in part, to benefit the
27 corporation, harbored, concealed, and shielded from detection an alien, MAC, a citizen
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29 //

30 INFORMATION:

31 HERBCO INTERNATIONAL, INC.;
32 EDWARD WILLIAMSON ANDREWS, III;
33 DAVID WILLIAM LYKINS, JR;
34 DEBRA RAE HOWARD - 1

1 and national of Mexico, while knowing and in reckless disregard of the fact the alien had
2 come to, entered, or remained in the United States in violation of law.

3 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

4 COUNT II

5 On or about April 22, 2011, at Duvall, within the Western District of Washington,
6 HERBCO INTERNATIONAL INC., a Washington corporation, by and through acts of
7 its employees, who acted in the scope of their employment and, in part, to benefit the
8 corporation, encouraged and induced an alien, MAC, a citizen and national of Mexico, to
9 reside in the United States while knowing or in reckless disregard of the fact the alien's
10 residence in the United States was in violation of law.

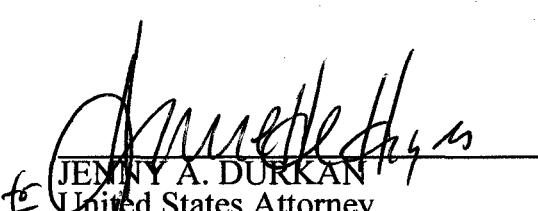
11 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

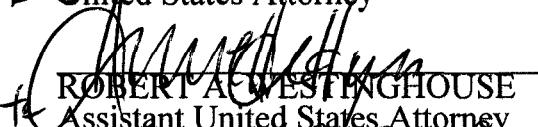
12 COUNT III

13 On or about April 22, 2011, through June 30, 2011 at Duvall, within the Western
14 District of Washington, EDWARD WILLIAMSON ANDREWS, III, DAVID WILLIAM
15 LYKINS, JR., and DEBRA RAE HOWARD, knowing that MAC, a citizen and national
16 of Mexico, was not authorized to be employed in the United States, continued to employ
17 him and other unauthorized aliens at HERBCO INTERNATIONAL INC.

18 All in violation of Title 8, United States Code, Section 1324a(a)(2) and (f) and
19 Title 18, United States Code, Section 2.

20 DATED this 3rd day of April, 2012.

21 
22 JENNY A. DURKAN
United States Attorney

23 
24 ROBERT A. WESTINGHOUSE
Assistant United States Attorney

25 
26 DONALD M. RENO, JR.
Assistant United States Attorney

27 INFORMATION:

28 HERBCO INTERNATIONAL, INC.;
EDWARD WILLIAMSON ANDREWS, III;
DAVID WILLIAM LYKINS, JR;
DEBRA RAE HOWARD - 2